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10 *Attorney for Plaintiff Bryan Holtzclaw
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13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

14 Bryan Holtzclaw,

15 Plaintiff,

16 v.

17 Romeo Aranas in his individual capacity;
18 Gregory Bryan in his individual capacity;
19 Bob Faulkner in his individual capacity;
20 Monique Hubbard-Pickett in her
21 individual capacity; Georges-Pele Taino in
22 his individual capacity; Nonilon Peret in
23 her individual capacity; Gregory Martin in
his individual capacity; Michael Minev in
his individual capacity

Defendants.

Case No. 2:19-cv-00041-RFB-NJK

Order to extend deadlines

24 Pursuant to FRCP 16(b)(4) and Local Rule 26-2, the parties stipulate and
25 agree to modify/extend the Scheduling Order (ECF 131) and respectfully request the
26 Court approve the proposed schedule: the parties stipulate that counsels for
27 Plaintiff and Defendants shall have an additional 30 days, or until October 23,

1 2023, to serve written discovery and deposition notices. Responses to written
2 discovery will be due 30 days after the written discovery is received by the parties.
3 This is the first stipulation for the extension of these deadlines. This request is
4 submitted at least twenty-one (21) days or more before the close of discovery
5 (January 22, 2024), is made in good faith, and is supported by good cause.

6 Holtzclaw initiated the current matter by filing a Complaint on or about
7 January 4, 2019.¹ This Court appointed the Federal Public Defender as counsel for
8 Holtzclaw on April 12, 2023.² Attorney Sandberg filed a notice of appearance on
9 May 12, 2023,³ and Attorney Norwood entered an appearance on August 24, 2023,⁴
10 substituting for Attorney Richter.

11 Plaintiff's counsel are preparing written discovery requests which will soon
12 be served on Defendants. Plaintiff believes the responses to these requests may
13 inform whether further requests or depositions are necessary in this case. The
14 parties would accordingly request that the Court modify the discovery order so that
15 (a) responses to discovery requests are due 30 days after service and (b) the
16 deadlines for providing written discovery and noticing depositions are extended
17 until Oct 23, 2023.

18 The additional discovery that needs to be completed included: the parties
19 need to exchange and respond to interrogatories and/or admissions; the parties need
20 to schedule and conduct depositions. It is anticipated that following depositions,
21 discovery will be completed.

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25 ¹ ECF No. 16.

26 ² ECF No. 124.

27 ³ ECF No. 125.

⁴ ECF No. 134.

1 Therefore, the parties stipulate and request that the date for Plaintiff and
2 Defendants to serve written discovery is extended an additional 30 days, until
3 October 23, 2023, and the deadline to respond to written discovery is 30 days after a
4 party receives written discovery.

5 It is so stipulated.

6 Dated September 13, 2023.

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8 Aaron D. Ford
Attorney General

9 /s/ Douglas Rands.
10 Douglas Rands
11 Deputy Attorney General

12 Attorney for Defendants

Rene L. Valladares
Federal Public Defender

/s/ Ryan Norwood
Ryan Norwood
Assistant Federal Public Defender

/s/ Kimberly Sandberg
Kimberly Sandberg
Assistant Federal Public Defender

Attorneys for Plaintiff

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16 IT IS SO ORDERED:

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20 Nancy J. Koppe
United States Magistrate Judge

21 Dated: September 14, 2023
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